

64240-30

1/14/2013

1/11



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JAN 14 2013

OFFICE OF  
CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Ms. Georgia Anastasiou  
Lewis & Harrison  
Agent for Combat Insect Control Systems  
122 C Street N.W., Washington, D.C. 20001

Dear Ms. Anastasiou:

The Agency is in receipt of your application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated Dec 12, 2012 for the product Combat Ant Bait F1. The Registration Division (RD) has conducted a review of the request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The Confidential Statement of Formulas (CSF) and/or label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please contact Melody Banks on 703 305-5413 or via email at [banks.melody@epa.gov](mailto:banks.melody@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Suarez".

for, Mark Suarez  
Product Manager  
Insecticide Branch  
Registration Division (7504P)

2/11

**EPA**

United States  
**Environmental Protection Agency**  
 Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number <b>64240-30</b>	2. EPA Product Manager <b>Richard Gebken</b>	3. Proposed Classification  <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>Combat Ant Bait F1</b>	PM# <b>10</b>	
5. Name and Address of Applicant (Include ZIP Code) <b>Combat Insect Control Systems</b> c/o Henkel Consumer Goods Inc. 19001 N. Scottsdale Rd. Scottsdale, AZ 85255 NOTE: PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW <input type="checkbox"/> Check if this is a new address	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: <b>NOTIFICATION</b> EPA Reg. No. _____ Product Name <b>JAN 14 2013</b>	

**Section - II**

- ☐ Amendment - Explain below. ☐ Final printed labels in response to Agency letter dated \_\_\_\_\_
- ☒ Resubmission in response to Agency letter dated **11/23/2012** ☐ "Me Too" Application
- ☒ Notification - Explain below. ☐ Other - Explain below

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)**Notification to make minor changes to the label. Please read cover letter for details.**

Notification in Accordance With PR Notice 98-10 This notification is consistent with the provisions of PR Notice 98-10 EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)		
*Certification must be submitted If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)

Name <b>Georgia Anastasiou - Lewis &amp; Harrison, LLC,</b> <b>122 C St. NW #505, Washington DC 20001</b>	Title <b>Agent for Combat Insect Control Systems</b>	Telephone (Include Area Code) <b>202-393-3903 ext. 19</b>
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received <b>(Stamped)</b>
2. Signature <i>Georgia Anastasiou</i>	3. Title <b>Agent for Combat Insect Control System</b>	
4. Typed Name <b>Georgia Anastasiou - Lewis &amp; Harrison, LLC</b>	5. Date <b>December 12, 2012</b>	

# LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 505  
Washington, D.C. 20001  
telephone 202.393.3903  
fax 202.393.3906

December 12, 2012

**HAND DELIVERED**

Document Processing Desk [NOTIF]  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

**ATTENTION: Richard Gebken  
Product Manager, Team 10**

**SUBJECT: Combat Insect Control Systems  
Combat Ant Bait F1 (EPA Reg. No. 64240-30)  
Response to Denial Dated 11/23/2012 for Notification per PR Notice 98-10**

Dear Mr. Gebken

On behalf of Combat Insect Control Systems, I am responding to the attached denial letter for the notification I submitted for the product **Combat Ant Bait F1 (EPA Reg. No. 64240-30)**. As discussed with Mark Suarez 12/7/2012, I have revised the label to reflect the following sentences as mandatory language: "Do not reuse or refill this container" and "Never place unused product down any indoor and outdoor approval." In addition please note that the purpose of this submission is to add non-FIFRA language, clarify which language is considered optional, move the "Directions for Use" header to the appropriate section, revision to the graphics, and minor changes to the marketing language.

In support of this submission enclosed please find the following documents:

- 1) Application for Pesticide Notification, which includes a signed statement certifying compliance with PR Notice 98-10;
- 2) One (1) copy of the label with changes highlighted; and,
- 3) ~~Two~~ <sup>one</sup> (2) copies of the revised label.

If you have any questions, please contact me at 202-393-3903 ext. 19 or by email at [georgia@lewisharrison.com](mailto:georgia@lewisharrison.com).

Sincerely,

*Georgia Anastasiou*

Georgia Anastasiou  
Agent for Combat Insect Control Systems

cc: Patricia McFadden (Combat Insect Control Systems)

4/11

Note: **Bold, Italicized text is information for the reader and is not part of the label.**  
[Bracketed information is optional text.]

Master Label, December 12, 2012  
EPA Reg. No. 64240-30  
Combat Ant Bait F1  
Pg 1 of 8

# COMBAT<sup>®</sup> Ant Bait F1

Approved Alternate Brand Names:  
[Combat Quick Kill Formula 3]  
[Combat Source Kill Max A1]  
[Combat Max Ant Killing Bait]



NOTIFICATION

JAN 14 2013

[FOR INDOOR AND OUTDOOR (adjacent to the home) USE]

[ANT]S

DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATIONS

## CAUTION:

SEE PRECAUTIONARY STATEMENTS ON BACK *-or-* SIDE PANEL

ACTIVE INGREDIENTS: Fipronil\*.....0.01%

OTHER INGREDIENTS: .....99.99%

TOTAL.....100.00%

\*CAS No. 120068-37-3

EPA Reg. No. 64240-30

EPA Est. No. \_\_\_\_\_

[Contains] [2] [4] [6] [8] [12]

CHILD-RESISTANT BAIT STATIONS

[TOTAL] NET WT [0.07oz (2g)] [0.14oz (4g)] [0.21oz (6g)] [0.28oz (8g)]

[0.42 oz (12g)]

[Manufactured for] [Distributed by] [&] ©[2012] Combat Insect Control Systems

[19001] [N. Scottsdale Rd.], Scottsdale, [AZ] [ARIZONA] 85255

MADE IN [USA][KOREA]

[Patent Pending] [Patent Number]

5/11

Note: **Bold, Italicized text is information for the reader and is not part of the label.**  
[Bracketed information is optional text.]

Master Label, December 12, 2012  
EPA Reg. No. 64240-30  
Combat Ant Bait F1  
Pg 2 of 8

## PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals:

**CAUTION:** Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

**FIRST AID:** If swallowed: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person. Have the product container or label with you when calling a poison control center or doctor, or going for treatment. **Questions? 1-800-426-6228.**

**STORAGE AND DISPOSAL:** [Do not contaminate water, food or feed by storage or disposal.]  
[Do not remove baits from [bait] [station[s].]

**STORAGE:** Store in cool, dry area out of reach of children.

**DISPOSAL:** If empty: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. If recycling is not available, place in trash. If partially filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**Note to Reviewer:** *Per PR-Notice 2007-4, this product will receive a batch code. The batch code number will be printed on each bait station. laser-coded on each primary package of the product after the container is sealed.*

### **For front or back or side panel:**


[Satisfaction guaranteed] [Guaranteed to work] [or your money back][!]

[EFFECTIVENESS GUARANTEED: COMBAT® [Insect Control Systems] stands behind this [insect killing system] [product] with a full [Satisfaction] Guarantee. Should you have any questions regarding COMBAT® [baits] [products], please call 1-800-426-6228.]

[For information, [call the Combat® [Labs] [Information] Helpline at 1-800-426-6228.]]

[[For questions or comments,] [please] [call the] Combat® [Labs] [Information] Helpline at 1-800-426-6228 [for information].

[The distinctive design and elements of this package are proprietary and owned by The Dial Corporation; A Henkel Company.]

[[] [[The] [Paperboard in this] Carton [contains] [is made from] \_\_\_\_\_ % Recycled fiber [minimum \_\_\_\_\_ % post consumer content].] [PLEASE RECYCLE EMPTY CARTON]

**—Optional Henkel statement for front or back or side panel:**



-or-



6/11

**DIRECTIONS FOR USE:**

~~It is a violation of federal law to use this product in a manner inconsistent with its labeling.~~

**[GENERAL INFORMATION]**

**[[THIS IS] HOW [THE] COMBAT® ANT BAIT F1 [QUICK KILL FORMULA 3] WORKS:]**

- [[Worker] Ants enter bait station and eat the bait ~~-or-~~ leave after eating ~~-or-~~ feeding on bait inside]

~~-or-~~

[This product will attract foraging worker ants to the bait feeding station. The ants will feed on the bait.]

- [Ants carry bait back to colony so that the bait can kill the queen and other ants.]

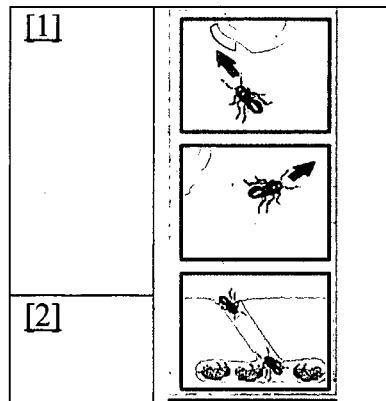
~~-or-~~

[Worker ants will take some of the bait back to the nest where they pass it on to kill the queen and entire colony.]

~~-or-~~

[Ants take the bait back to the nest.]

- [Ants pass the bait on to the queen and destroy the entire colony.]



- [This product contains an effective insecticide ingredient which kills most ants commonly found in households ~~-or-~~ homes. This product is effective because ants carry bait back to where they live (the colony) to destroy queen the entire colony. It even kills ants [you don't see] outside (adjacent to) your home to prevent more ants from coming inside.]

- [This product kills the following ants which feed on sweet and greasy materials: Fire, Argentine, Cornfield Ants, Little Black, Odorous House, and Pavement Ants.]

~~-or-~~

- [Kills common household ants, including Argentine, Cornfield, Odorous House and Pavement Ants.]

~~GUARANTEED TO WORK OR YOUR MONEY BACK! Call the COMBAT® HELPLINE at 1-800-426-6228 for information.~~

7/11

## DIRECTIONS FOR USE:

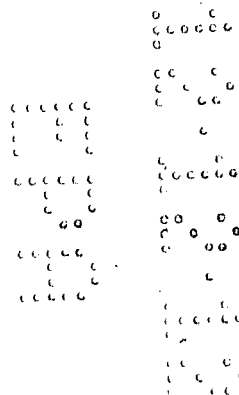
It is a violation of federal law to use this product in a manner inconsistent with its labeling.

## APPLICATION INSTRUCTIONS

1. Use [all] [*package count*] [several] bait[s] [station[s]] [at the same time for thorough control]. [Large or heavily infested areas may require more bait stations.] Break bait[s] [station[s]] apart [from plastic frame]. [Simply] [Place [each] bait[s] [station[s]] [by] [near] ant trails – ***or*** – [close to areas] [where ants are numerous] – ***or*** – [or where you frequently see ants.] [Place additional bait[s] [station[s]] [near cracks, along sills or] anywhere [that] ants might – ***or*** – may enter your home.]
2. [Do not spray insecticide on or around the bait stations. Spray[s] [will] contaminate [the] baits and reduce [their] effectiveness.]
3. Replace [all][*package count*] bait[s] [station[s]] every [after] 3 months [of] [indoor] [use] to keep ants from reappearing – ***or*** – returning.



– ***or*** –



8/11

Note: ***Bold, Italicized text is information for the reader and is not part of the label.***  
[Bracketed information is optional text.]

Master Label, December 12, 2012  
EPA Reg. No. 64240-30  
Combat Ant Bait F1  
Pg 5 of 8

***DIRECTIONS FOR USE -- APPLICATION INSTRUCTIONS, Continued***

1. [To activate] [remove cellophane wrapper.] [Tear along perforation lines.] [Do not remove or puncture label[s] on bait stations.] [Now the baits are ready to use.] [Do not remove or puncture white label on bait stations.]

[Inside, COMBAT can be placed in cabinets, next to dishes, or anywhere your ant problem occurs.]

[For general control of ants outdoors (adjacent to your home) and to prevent them from coming indoors, place a bait station every 15-20 feet around the perimeter of your home.] [Place additional COMBAT bait stations near cracks or crevices, along sills, or anywhere ants may gain entry indoors – ***or*** – that ants might enter your home.]

[Outside (adjacent to) your home, place additional COMBAT bait stations near cracks and crevices, along sills, or anywhere ants may gain entry.]

[Increased ant activity may be seen near the bait stations for short periods, but you can expect to see less activity within a day – ***or*** – a few days – ***or*** – a week. **[TIP:]** For best results, do not interfere with the ants or the bait stations during [its] use because ants must carry bait back to the colony so that it can kill – ***or*** – destroy the queen and the other ants – ***or*** – the entire colony.]

2. [Do not spray the bait stations.]
3. [For continuous control of ants,] Replace [all] [*package count*] bait[s] after 6 weeks [of use outdoors adjacent to home] – ***or*** – [to keep ants from returning.]

9/11

Note: ***Bold, Italicized text is information for the reader and is not part of the label.***  
[Bracketed information is optional text.]

Master Label, December 12, 2012  
EPA Reg. No. 64240-30  
Combat Ant Bait F1  
Pg 6 of 8

***Optional Claims for front or back:***

- With [a blend of] [multiple] foods ants eat
- With foods ants find attractive [appealing]
- With multiple foods to kill [the] queen and [the] [entire] colony
- Destroys – ***or*** – Kills [the] queen and [the] [entire] colony [source]
- Quick kill formula
- Fast formula
- Kills the ants you see and ones you don't see
- Long lasting power
- Non-stop ant control
- Provides long lasting ant killing power
- Kills common household ants, including: Argentine Ants, [, Little Black Ants, Cornfield Ants, Odorous House Ants, Pavement Ants]
- Kills ants without messy residue and without insecticide odors – ***or*** – fumes
- For common household ants
- Kills grease and sugar loving ants
- Ants carry bait back to the colony so that the bait can kill the queen and other ants so that they don't invade your home
- Kills ants outdoors (adjacent to the home) before they come indoors so that they don't invade your home
- Kills [the] entire colony
- Child-resistant [bait] [stations]
- Attracts worker ants to the bait stations
- Leaves no residue or odor

Note: ***Bold, Italicized text is information for the reader and is not part of the label.***  
[Bracketed information is optional text.]

Master Label, December 12, 2012  
EPA Reg. No. 64240-30  
Combat Ant Bait F1  
Pg 7 of 8

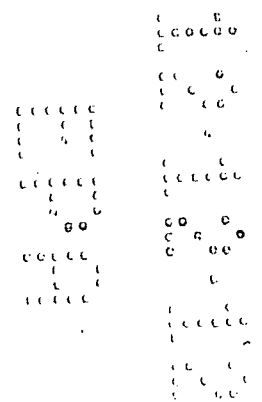
10/11

***Claims for front or back (continued):***

- Kills ants without insecticide odors [fumes]
- Kills ants at their source
- Controls ant problem
- Starts [working] as soon as you activate
- Lasts for 1-3 months
- Kills ants quickly
- No vapor, fumes or odor [easy to use] [nothing to activate]
- Easy to use
- Nothing to activate
- [Destroys] ~~or~~ [kills] [the] queen and [the] [entire] colony [source]

***For 6 count or more (will not exceed 12 bait stations):***

- Great value
- Value size
- Economy size
- [Bonus Pack] (***applies to packs to which more baits are added***)
- [50% More Free] (***applies to packs to which 50% more baits are added***)
- [6 Bonus Baits With Purchase] (***applies to packs to which 6 more baits are added***)



Note: ***Bold, Italicized text is information for the reader and is not part of the label.***  
[Bracketed information is optional text.]

Master Label, December 12, 2012  
EPA Reg. No. 64240-30  
Combat Ant Bait F1  
Pg 8 of 8

**UNIT LABEL**

# COMBAT<sup>®</sup> Ant Bait F1

**THIS SIDE DOWN OR AGAINST SURFACE**

Note: Do not remove or puncture this label

ACTIVE INGREDIENTS: Fipronil\*.....0.01%  
OTHER INGREDIENTS: .....99.99%  
TOTAL.....100.00%

\*CAS No. 120068-37-3

**DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATIONS**

## CAUTION:

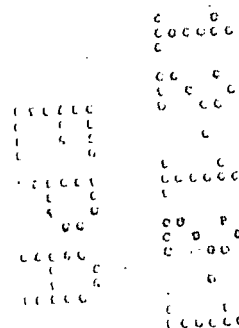
Wash [hands] thoroughly with soap and water after handling [bait stations].  
[Do not contaminate water, food or feed by storage or disposal.]

**DISPOSAL:** If empty: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. If recycling is not available, place in trash. If partially filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[For more information,] [call the] Combat<sup>®</sup> [Labs] [Information] Helpline at 1-800-426-6228 –  
**or** – For questions or comments, please [call the] Combat<sup>®</sup> [Labs] [Information] Helpline at 1-  
800-426-6228 [for [more] information]. – **or** – Call the Combat<sup>®</sup> Helpline at 1-800-426-6228  
[for information]. – **or** – Questions or Comments? Call 1-800-426-6228.

[Manufactured for] [Distributed by] [&] ©[2012]  
Combat Insect Control Systems  
Scottsdale, [AZ] [Arizona] 85255  
Made in [U.S.A.][KOREA]

EPA Reg. No. 64240-30  
EPA Est. No.



SEE OUTER CARTON – **or** – BAG – **or** – CONTAINER FOR COMPLETE DIRECTIONS AND PRECAUTIONS

Net Weight 0.035 oz (1.0g)